



Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

September 14, 1998

To: Chief Executive Officers of National Banks

I am writing to update you on the OCC's Year 2000 supervisory activities and to apprise you of our most recent Year 2000 initiatives. Year 2000 readiness is a critical enterprise-wide concern for every industry world wide and is a top priority for the OCC.

Our supervisory activities over the last quarter indicate the banking industry has made progress in meeting the challenges posed by the Year 2000. Nevertheless, we recognize that the most costly and time-consuming phases of preparing for Year 2000 readiness are yet to come -- testing and contingency planning. As your institutions begin to test and implement necessary changes, we will continue to assist you by providing supervisory guidance, sharing best practices, and providing additional updates regarding the status of our activities and findings. We welcome your comments and concerns and look forward to continuing to work together to meet the challenges presented by the Year 2000.

OCC's Year 2000 Supervisory Activities and Findings

As of June 30, 1998, the OCC had completed at least one Year 2000 on-site examination of every institution that it supervises. The focus of these examinations was to determine the progress these institutions are making toward Year 2000 readiness. Nearly 96 per cent of the institutions examined by the OCC are rated satisfactory, compared to 86 per cent at the end of the first quarter of 1998. We are pleased with this progress. However, given the challenges you face in the coming months, we anticipate that the Y2K summary ratings for many banks may change as testing issues are addressed.

Based on our examinations to date, we have found that banks rated less than satisfactory demonstrated a number of common problems and deficiencies, including:

- *Inadequate processes to assess customer readiness.*
- *Insufficient allocation of financial resources to complete necessary tasks.*
- *Failure to meet scheduled deadlines.*
- *Ineffective management oversight of Year 2000 efforts and reporting.*

- *Ineffective risk management process.*

Upcoming OCC Year 2000 Supervisory Steps and Other Year 2000 Supervisory Initiatives

As you are aware, the industry is entering the critical Year 2000 testing phase. To more fully address the issues that testing and implementation will present, the OCC has established a supervisory program covering the period from July 1, 1998 to March 31, 2000. The program requires examiners to complete two additional on-site examinations by June 1999. The first, to be completed by year-end 1998, will review banks' testing plans. The second, to be completed during the first half of 1999, will review banks' testing results. We anticipate that the two comparatively short on-site examinations between now and June 30, 1999, will maximize the time available for corrective action on the part of banks when deficiencies are identified. They also will enable the OCC to quickly identify banks that are experiencing testing problems.

The OCC will conduct more frequent Year 2000 on-site examinations in those banks that are not making adequate progress toward being ready for the Year 2000. In quarters when a bank does not receive an on-site examination, it will receive an off-site review.

- *Focus for Upcoming Y2K Reviews.* Going forward, all on-site Year 2000 examinations will use the FFIEC Phase II Year 2000 procedures. The procedures were distributed with OCC Advisory Letter (AL) 98-8 and also are available on the OCC's Y2K website (www.occ.treas.gov/y2k/default.htm). The OCC has recently completed training for approximately 550 examiners to perform these examinations which will focus on testing and contingency planning and will include the following:
 - ▶ A review of the bank's testing plans and evaluation of testing progress, as applicable;
 - ▶ An assessment of the bank's ability to successfully implement its testing program;
 - ▶ A review of the bank's customer due diligence process;
 - ▶ A review of the bank's responses to the Self-Assessment Survey previously distributed to all national banks;
 - ▶ A discussion of the bank's progress in developing a customer awareness strategy; and
 - ▶ Follow up on any outstanding issues.

- *Contingency Planning.* In the OCC's AL 98-7 which contained the FFIEC's guidance on contingency planning, we stated our expectations that national banks should complete the first phases of their business resumption contingency planning process by September 30, 1998 and the remaining phases by December 31, 1998. We have heard from many bankers that the target dates in this advisory letter will be difficult to meet because of the complexity of the guidance and the need to focus resources on remediation efforts. As I believe these concerns are valid, I have asked my staff to add additional flexibility to the existing contingency planning time frames. By September 30, 1998, we expect you will have developed operational planning guidelines and have started the business impact analysis phase. The contingency plan and validation phases of the contingency planning process should be well underway by year-end. I also encourage you to work cooperatively with other financial institutions as you develop your business resumption contingency plans.

In addition, the FFIEC Interagency Y2K Working Group is reviewing the contingency planning document and soliciting comments from the industry as to what further guidance is needed. This review and any new guidance, most likely in the form of questions and answers, will be complete by the end of the year.

- *FFIEC Outreach Programs.* The OCC is continuing to participate in FFIEC outreach and training programs designed to focus on Year 2000 issues and regulatory concerns. We have participated in nearly 100 state bankers' meetings involving over 8,900 bankers. A schedule of these meetings is included on the OCC's Y2K website. You should have received an invitation to your state banker meeting, however if you did not, or if you were unable to attend and are interested in participating in future meetings, please contact your state banker association. In addition, OCC has participated in FFIEC vendor conferences and other industry meetings to engage in dialogue regarding Year 2000 challenges.
- *OCC Outreach Programs.* Members of the OCC's staff also continue to meet with groups of bankers representing banks of all sizes and complexities to discuss a wide range of Y2K-related issues. This is an opportunity for the OCC to hear about the concerns bankers have regarding Y2K and for us to use the group as a "sounding board" for upcoming issuances. The OCC has found these meetings very valuable, as they have helped us identify common industry concerns. We plan to continue to hold such meetings at various locations around the country over the next several months. If you would like to know if a meeting is planned in your area, please contact your examiner-in-charge.
- *Centralized Review of Data Centers.* During the month of September, a team comprised of OCC examiners from the bank information systems (BIS) cadre and consultants will review the testing plans of the multi-regional data processing servicers (MDPSs), shared application software providers, and independent data centers (IDCs) supervised by the OCC. This

centralized review will provide consistent and timely review of testing plans, which will identify key issues for examiners to consider when assessing individual banks' testing plans. The results of this review will be available for use by examiners when examining the vendor's client banks. This centralized review should significantly reduce duplication of effort, afford examiners better, more timely information, and minimize the time spent on-site in banks.

- *Future Issuances.* A complete list of FFIEC Year 2000-related issuances can be found at www.ffiec.gov/y2k/default.htm.

The FFIEC has recently issued the following additional guidance:

- ▶ *Answers to commonly asked questions.* These questions mainly regard testing and contingency planning, and the answers are intended to provide clarification for bankers to commonly asked questions and concerns. (AL 98-13)
 - ▶ *Fiduciary guidance.* This guidance reminds bankers of the potential for increased risk of Year 2000 problems associated with fiduciary services. The guidance also describes actions that institutions should use to manage these risks. (AL 98-14)
- *Upcoming key dates.* Attachment 1 contains upcoming dates that are important to the Year 2000 readiness project. Please review this list to ensure that your bank is prepared to meet these deadlines.

Other Issues

- *Securities filings disclosures.* Year 2000 issues may raise disclosure requirements under the federal securities laws. The Securities and Exchange Commission (SEC) has recently released an official Interpretation to provide specific guidance on federal securities law disclosure obligations associated with Year 2000 compliance. The SEC's Interpretation reminds companies filing securities disclosures to consider their obligations to disclose anticipated costs, problems, uncertainties, or other material facts associated with measures undertaken to operate systems beyond the Year 2000. The OCC recently sent a copy of the SEC's Interpretation to all national banks with AL 98-12. National banks may be required to file securities disclosures with the OCC under 12 C.F.R. Part 11 (Securities Exchange Act Disclosure Rules) or 12 C.F.R. Part 16 (Securities Offering Disclosure Rules). The OCC's Securities and Corporate Practices Division review of banks' filings under Parts 11 and 16 will be consistent with the SEC's Interpretation for treatment of Y2K issues.
- *Environmental Systems.* The OCC recently completed the Year 2000 assessment phase for its own mission-critical environmental systems. These systems include elevators, security

systems, and heating/air conditioning systems at all of our locations. Environmental systems pose a serious potential risk to the ability of any organization to function in the Year 2000 and beyond. For banks, this includes the risk of experiencing environmental system malfunctions that may interrupt their ability to support their customers' banking needs. To ensure that this risk is adequately addressed, we want to remind you that mission-critical environmental systems should be included in your bank's testing and contingency plans.

- *Distribution of examination reports of service providers and software vendors.* The first phase of interagency examinations of service providers and software vendors using standardized examination procedures was completed June 30, 1998. Distribution of the reports of the examinations conducted by the OCC was completed as of August 24, 1998. As the OCC receives reports from the other agencies, we are distributing them to the client financial institutions. The FFIEC agencies will continue to monitor service providers and software vendors quarterly. Updated reports will be sent to client financial institutions if there is a change in a Year 2000 examination rating.

These examination reports supplement, but are not a substitute for, each financial institution's efforts to obtain any necessary information directly from a service provider or software vendor to assess Year 2000 readiness.

Attachment 2 lists the service providers and software vendors examined by the FFIEC agencies. If you are a client of any of these service providers or software vendors, and have not received a copy of the report of examination or summary of findings, please contact your examiner-in-charge or portfolio manager.

- *International Year 2000.* The OCC's Global Banking Division, a division of Bank Supervision Policy, has been established as a focal point for international Y2K policy issues. The unit is an active liaison with external private and public sector entities and groups, and its major focus for the next 18 months will be risks posed to the national banking system by global Year 2000 and Euro readiness.
- *Confidential Ratings.* We were recently informed that a rating agency had contacted all financial institutions asking them for their Year 2000 summary ratings. While we support your keeping your customers and others apprised of your progress toward becoming ready for the Year 2000, please remember that your Year 2000 summary rating, like your CAMELS rating, is confidential and must not be disclosed to unauthorized parties, including rating agencies. The OCC will shortly be issuing an advisory letter to remind bankers of this concern.

Conclusion

We appreciate your ongoing efforts to meet the Year 2000 challenges. As I stated in my last letter, I would appreciate your letting me know, through the Assistant Deputy Comptroller with

supervisory responsibility for your bank or, for banks in the large bank program, through your examiner-in-charge, what information you find most useful in these updates and whether there are any other Year 2000 issues that you would like to see addressed. Thank you again for all of your effort on this important project.

Sincerely,

Julie L. Williams
Acting Comptroller of the Currency

Attachments

FFIEC / OCC Y2K CHRONOLOGY

DEADLINES	DESCRIPTION
6/30/98	<p>OCC's first round of on-site FFIEC Y2K exam of all financial institutions, service centers and service providers we supervise should be complete.</p> <p>Banks' due diligence identifying, assessing, and establishing controls for Y2K risk posed by customers, should be complete.</p> <p>Bank's written testing strategies and plans must be complete.</p>
9/1/98	Institutions processing in-house and service providers should have commenced testing of internal mission-critical systems, including those programmed in house and those purchased from software vendors.
9/30/98	<p>Banks' assessment of individual customers' Y2K preparedness and the impact on an institution should be substantially complete.</p> <p>Banks should have developed operational planning guidelines and started the business impact analysis phase of the contingency planning process.</p> <p>Banks' customer awareness program should be complete.</p>
12/31/98	<p>Renovation should be largely completed for mission-critical applications -- code enhancement and revisions, hardware upgrades.</p> <p>Testing of internal mission-critical systems, including environmental systems, should be substantially complete. Service providers should be ready to test with customers.</p> <p>The contingency plan and validation phases of the contingency planning process should be well underway.</p>
3/31/99	<p>Testing by institutions relying on service providers for mission-critical systems should be substantially complete.</p> <p>External testing with material other third parties (customers, other financial institutions, business partners, payment system providers, etc.) should have begun.</p>
6/30/99	Testing of mission-critical systems should be complete and implementation should be substantially complete.
12/31/99	All mission critical applications must be compliant.

Mission-critical system or application = An application or system is mission-critical if it is vital to the successful continuance of a core business activity. An application also may be mission-critical if it interfaces with a designated mission-critical system. Products of software vendors also may be mission-critical.

LEGAL NOTICE

Attached is a list of service providers and software vendors (external third party suppliers) that the Federal Financial Institutions Examination Council, through its member agencies (FFIEC), has examined for Year 2000 readiness. The FFIEC provides this list on an "as is" and "as available" basis as an informational resource for financial institutions regulated by the FFIEC. This list is intended to apprise financial institutions of the Year 2000 examinations and program reviews conducted by the FFIEC of external third party suppliers. Financial institutions that are the clients of service providers may request a copy of an examination report of their service provider from the appropriate Federal banking agency. Financial institutions that use the specific software products listed may request a copy of a Year 2000 review of each of their products from the appropriate Federal banking agency.

Although the FFIEC has taken reasonable measures to ensure the quality of the list, the FFIEC does not warrant the list to be accurate, correct, complete, timely, or without mistake or misrepresentation. The list is subject to change without notice. Without waiver of any defense otherwise provided by law, the FFIEC and its member agencies disclaim all liability, including liability for damages, whether caused directly or indirectly by the use of this list or the information referenced in the list. You should note further that the inclusion or exclusion in the list of an external third party supplier does not constitute legal advice, or an endorsement, favoring, recommendation, or certification as to the Year 2000 readiness of the supplier, or its products and services. As provided in the FFIEC guidance, each financial institution is responsible for communicating with its external third party suppliers in order to determine the extent to which it can rely on their services and products to perform effectively with respect to Year 2000.

The FFIEC reserves the right to change this legal notice at any time and without notice. Use of this list or the information referenced in the list constitutes consent to the above terms.

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
	Office of the Comptroller of the Currency			
1	SouthTrust Bank, N.A.	Birmingham	AL	OCC
2	SBS Data Services, Inc.	Birmingham	AL	OCC
3	VISA International	San Francisco	CA	OCC
4	Advanta Mortgage Corp.	San Diego	CA	OCC
5	Bank Data Solutions, Inc.	Lancaster	CA	OCC
6	First National Bank	San Diego	CA	OCC
7	Unisys Corp	Bakersfield	CA	OCC
8	National Bank of Redwoods	Santa Barbara	CA	OCC
9	Wells Fargo Bank NA	San Francisco	CA	OCC
10	Electronic Payment Services, Inc. (EPS)	Wilmington	DE	OCC
11	Digital Data Services	Miami	FL	OCC
12	FNB & TC	Ft. Walton Beach	FL	OCC
13	First Banking Services, Inc.	Ft. Walton Beach	FL	OCC
14	FNB of Grady County	Cairo	GA	OCC
15	Provesa, Inc.	Norcross	GA	OCC
16	Checkfree	Norcross	GA	OCC
17	SHAZAM, Inc./ITS, Inc.	Johnston	IA	OCC
18	Peoples National Bank	Council Bluffs	IA	OCC
19	Security NB of Sioux City	Sioux	IA	OCC
20	FNB of Harrisburg	Harrisburg	IL	OCC
21	MICR Resource Management	Chicago	IL	OCC
22	First Bankers Trust, NA	Quincy	IL	OCC
23	FNB of Oblong	Oblong	IL	OCC
24	Uptown NB of Chicago	Chicago	IL	OCC
25	Mercantile Bank, N.A.	Hartford	IL	OCC
26	Cash Station, Inc.	Elgin	IL	OCC
27	Alltel FM: CIS	Evansville	IN	OCC
28	Old National Service Corp	Evansville	IN	OCC
29	The Merchants National Bank	Terre Haute	IN	OCC
30	Citizens National Bank	Tell City	IN	OCC
31	Midwest Trust Company	Overland Park	KS	OCC
32	City National Bank	Fulton	KY	OCC
33	Morganfield National Bank	Morganfield	KY	OCC
34	Whitney National Bank	New Orleans	LA	OCC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
35	Blackstone Financial	Hopewell	MA	OCC
36	Delmarva Bank Data Processing	Easton	MD	OCC
37	DMA Associates	Saco	ME	OCC
38	The Merchants NB of Winona	Winona	MN	OCC
39	Jack Henry & Associates, Inc.	Roseville	MN	OCC
40	Databank Information Services, LLC	Willmar	MN	OCC
41	TCF - Bank Services Division	Minneapolis	MN	OCC
42	The Midway NB of St. Paul	St. Paul	MN	OCC
43	FBS Business Tech. Center	St. Paul	MN	OCC
44	Norwest Services, Inc.	Minneapolis	MN	OCC
45	UMB Bank, NA	Kansas City	MO	OCC
46	Jack Henry & Associates, Inc.	Monett	MO	OCC
47	DST Systems, Inc.	Kansas City	MO	OCC
48	MasterCard International	Purchase	MO	OCC
49	First National Bank of Fairfield	Fairfield	MT	OCC
50	First Union National Bank	Charlotte	NC	OCC
51	NationsBank, NA	Charlotte	NC	OCC
52	Wachovia Bank, NA	Winston-Salem	NC	OCC
53	Wachovia Operational Services	Winston-Salem	NC	OCC
54	Jack Henry & Associates, Inc.	Charlotte	NC	OCC
55	First Commerce Tech. (FCT)	Lincoln	NE	OCC
56	Interstate Business Eq., Inc.	Ralston	NE	CCC
57	NETS, Inc.	Lincoln	NE	OCC
58	Cattle NB of Seward	Seward	NE	OCC
59	Cornerstone Bank NA	York	NE	OCC
60	FIserv/Info. Technology, Inc.	Lincoln	NE	OCC
61	FNB of Omaha	Omaha	NE	OCC
62	National Bank of Sussex County	Branchville	NJ	OCC
63	Oneida Valley NB	Oneida	NY	OCC
64	Glens Falls NB & TC	Glens	NY	OCC
65	NY Clearing House Association (CHIPS)	New York	NY	OCC
66	IBM Global Services	Somers	NY	OCC
67	Citibank, NA	New York	NY	OCC
68	SCC Resources, Inc.	Sandusky	OH	OCC
69	Alliance Data Systems	Gahanna	OH	OCC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
70	Star Bank NA	Cincinnati	OH	OCC
71	National City Bank	Cleveland	OH	OCC
72	FirstMerit Bank, NA	Akron	OH	OCC
73	Banc One Service Corporation	Columbus	OH	OCC
74	FirstMerit Services Division	Akron	OH	OCC
75	Lorain National Bank	Lorain	OH	OCC
76	CHEXS, Huntington NB	Columbus	OH	OCC
77	Star Bank Information Services	Cincinnati	OH	OCC
78	FNB of Okmulgee	Okmulgee	OK	OCC
79	Bank of Oklahoma N.A.	Tulsa	OK	OCC
80	Central NB & TC of Enid	Enid	OK	OCC
81	FNB & TC of Muskogee	Muskogee	OK	OCC
82	The Citizens NB of Evans City	Evans City	PA	OCC
83	Computer Research Inc (CRI)	Canonsburg	PA	OCC
84	Network Data Center	Slatington	PA	OCC
85	Mellon Bank, NA	Pittsburgh	PA	OCC
86	Precision, Inc.	Sioux Falls	SD	OCC
87	FNB of Sioux Falls	Sioux Falls	SD	OCC
88	First Tennessee Bank NA	Memphis	TN	OCC
89	National Bank of Commerce	Memphis	TN	OCC
90	Advanced Computer Enterprises (ACE)	Marysville	TN	OCC
91	Union Planters Bank NA	Memphis	TN	OCC
92	McCoy Myers & Associates: HQ	Amarillo	TX	OCC
93	Management Information Resources (MIR)	Lubbock	TX	OCC
94	Commlink Corp		TX	OCC
95	McCoy Meyers, Inc.	Amarillo	TX	OCC
96	Plains NB of West Texas	Lubbock	TX	OCC
97	Computer Bank, Inc.	Mt. Pleasant	TX	OCC
98	Chase Bank of Texas, NA	Houston	TX	OCC
99	Town North National Bank	Farmers Branch	TX	OCC
100	Excelis, Inc.	Dallas	TX	OCC
101	Frost Bank, NA	San Antonio	TX	OCC
102	FNB of Abilene	Abilene	TX	OCC
103	Amarillo National Bank	Amarillo	TX	OCC
104	Bank Services of Virginia	Basset	VA	OCC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
105	Vermont National Bank	Brattleboro	VT	OCC
106	Fiserv, Inc.	Brookfield	WI	OCC
107	US Processing	Milwaukee	WI	OCC
108	FirStar Information Services	Milwaukee	WI	OCC
109	The City NB of Charleston	Charleston	WV	OCC
110	City Holding company	Charleston	WV	OCC
111	Hilltop National Bank	Casper	WY	OCC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
	Federal Deposit Insurance Corporation			
1	First United Data Center	Little Rock	AR	FDIC
2	Datamatics Financial Services	Little Rock	AR	FDIC
3	American Express Travel Related	Phoenix	AZ	FDIC
4	BankLink Corporation	Riverside	CA	FDIC
5	On-Line Computer Systems, Inc.	Santa Ana	CA	FDIC
6	Colorado Imaging Company, Inc.	Denver	CO	FDIC
7	UNIPAC Service Corp.	Aurora	CO	FDIC
8	Innovative Bancware Solutions, Inc.	Durango	CO	FDIC
9	FTS 2000, Inc.	Denver	CO	FDIC
10	Open Solutions, Inc.	Glastonbury	CT	FDIC
11	Applied Card Systems, Inc	Wilmington	DE	FDIC
12	Credomatic of Flordia	Miami	FL	FDIC
13	Equifax Credit Services, Inc.	Tampa	FL	FDIC
14	Community Bank Data Systems, Inc.	Americus	GA	FDIC
15	First Franklin Financial Corporation	Toccoa	GA	FDIC
16	Total Systems Services, Inc.	Columbus	GA	FDIC
17	New ERA Financial Services, Inc.	Davenport	IA	FDIC
18	Novus Credit Services, Inc.	Chicago	IL	FDIC
19	Castle Bankgroup, Inc.	Dekalb	IL	FDIC
20	On-Line Financial Services, Inc.	Oak Brook	IL	FDIC
21	Dean Phillips, Inc.	Quincy	IL	FDIC
22	IBM Global Services/ Network	Schaumburg	IL	FDIC
23	Bank Computer Services, Inc.	Hartford	IN	FDIC
24	Bankline MidAmerica	Lenexa	KS	FDIC
25	Universal Money Center, Inc.	Shawnee Mission	KS	FDIC
26	Guardian Trust Company	Topeka	KS	FDIC
27	B.S.C., Inc.	Lexington	KY	FDIC
28	Computer Services, Inc. (CSI)	Paducah	KY	FDIC
29	Financial Institution Services	West Monroe	LA	FDIC
30	First National Systems Corporation	Cotuit	MA	FDIC
31	Financial Institutions Service	Lewiston	ME	FDIC
32	West Shore Computer Services	Scottville	MI	FDIC
33	Bancmidwest Corporation	St. Paul	MN	FDIC
34	Frandsen Financial Corporation	Forest Lake	MN	FDIC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
35	Bancdata Processing Corp.	Roseville	MN	FDIC
36	Deluxe Corporation	Shoreview	MN	FDIC
37	Silverlake (Jack Henry & Associates)	Monett	MO	FDIC
38	D.L. Salveter, C.P.A. Firm Servicer	Crocker	MO	FDIC
39	Gateway Financial Services, Inc.	St. Charles	MO	FDIC
40	Poplar Bluff Computer Center	Poplar Bluff	MO	FDIC
41	First State Bancorp., Inc.	Carthersville	MO	FDIC
42	CIF 20/20 (Jack Henry & Associates, Inc.)	Monett	MO	FDIC
43	First Services, LP	Creve Couer	MO	FDIC
44	Midwest Data Processing, Inc.	Dexter	MO	FDIC
45	Bankers Resource Center, Inc.	Helena	MT	FDIC
46	First Interstate Banksystem	Billings	MT	FDIC
47	Liberty Banking System (Jack Henry & Assoc., Inc.)	Charlotte	NC	FDIC
48	Corporate Data Services, Inc.	Asheboro	NC	FDIC
49	SPARAK 3000 (Sparak Financial Systems, Inc.)	Fargo	ND	FDIC
50	Independent Data Services, Inc.	Jamestown	ND	FDIC
51	Accudata, Inc.	Park River	ND	FDIC
52	Financial Services, Inc.	Glen Rock	NJ	FDIC
53	Ruidoso State Corporation	Ruidoso	NM	FDIC
54	Western Data Services, Inc.	Las Cruces	NM	FDIC
55	Nomura Research Institutue Amer.	New York City	NY	FDIC
56	Nicola banking System (Nicola Banking Sys., Inc.)	Chickasha	OK	FDIC
57	Pioneer Data Systems, Inc.	Ponca City	OK	FDIC
58	C-Teq, Inc.	Oklahoma City	OK	FDIC
59	LUN Data Services	Montandon	PA	FDIC
60	GM Group Inc.	Rio Piedras	PR	FDIC
61	H-R-U Data Center, Inc.	Hato Rey	PR	FDIC
62	Pioneer Bancshares	Chattanooga	TN	FDIC
63	Financial Data Technology Corporation	Franklin	TN	FDIC
64	L.E. Vickers & Associates	Cookville	TN	FDIC
65	Group Data Services	Parsons	TN	FDIC
66	Community Data Services, Inc.	Cleburne	TX	FDIC
67	West Bancshares, Inc.	West	TX	FDIC
68	BISYS Group, Inc.	Houston	TX	FDIC
69	Computer Center, Inc.	Monahans	TX	FDIC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
70	South Plains Financial Co.	Lubbock	TX	FDIC
71	Greentree Software, Inc.	Shallowater	TX	FDIC
72	F&M Data Processing, Inc.	DeLeon	TX	FDIC
73	Hewlett Computer Services	Cleburne	TX	FDIC
74	First Independent Computers	Abilene	TX	FDIC
75	BMA Management Support Group	Salt Lake City	UT	FDIC
76	Systems Analysis, Inc.	Bellevue	WA	FDIC
77	Pemco Corporation	Seattle	WA	FDIC
78	United Financial Services, Inc.	Grafton	WI	FDIC
79	Electronic Strategies, Inc. (ESI)	Menomonie	WI	FDIC
80	Great Lakes Higher Education	Madison	WI	FDIC
81	Five Star Corporate Services, LLC	Bruce	WI	FDIC
82	Midwest Data Services, Incorporated	La Crosse	WI	FDIC
83	Central Processing Center, LLP	Mondovi	WI	FDIC
84	Heartland Data Center	Cameron	WI	FDIC
85	Community First Data Services, Inc.	Cheyenne	WY	FDIC

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
	Federal Reserve Board			
1	ALLTEL Information Services, Inc.	Little Rock	AR	FRB
2	Advance Data	Jonesboro	AR	FRB
3	Digisource	Fayetteville	AR	FRB
4	Bank Processing, Inc.	Redding	CA	FRB
5	Bank Services Corp.	Colorado Springs	CO	FRB
6	Flserv/CBS (Comprehensive Banking System)	Orlando	FL	FRB
7	Bank Data, Inc.	Warrington	FL	FRB
8	Capital City Services Company	Tallahassee	FL	FRB
9	HONOR Technologies, Inc.	Maitland	FL	FRB
10	DataPro (Integrated Banking System IBS)	Miami	FL	FRB
11	UnionDataCorp	Streator	IL	FRB
12	First Midwest Data Corporation	Melrose Park	IL	FRB
13	Data Center, Inc.	Hutchinson	KS	FRB
14	National Processing Company	Louisville	KY	FRB
15	Central Maryland Service Corporation	Ellicott City	MD	FRB
16	CFC Data Corp.	Midland	MI	FRB
17	Magicline, Inc.	Dearborn	MI	FRB
18	Modern Computer Systems (BankServ, CU Serv)	Burnsville	MN	FRB
19	BancTec, Inc.	North Kansas City	MO	FRB
20	Pinnacle Data Corp.	Gretna	NE	FRB
21	First Security Services	Las Vegas	NV	FRB
22	Provident Technical Services, Inc.	Cincinnati	OH	FRB
23	Midwest Payment Systems, Inc.	Cincinnati	OH	FRB
24	Rurbanc Data Services, Inc.	Defiance	OH	FRB
25	DataTech of Oregon, Inc.	Eugene	OR	FRB
26	SEI Investments	Wayne	PA	FRB
27	Sungard Data Services, Inc.	Wayne	PA	FRB
28	Electronic Data Systems, Inc. (EDS)	Plano	TX	FRB
29	Peerless Systems, Inc. (INFORM/Peerless 21)	Richardson	TX	FRB
30	Transalliance LP	Bellevue	WA	FRB
31	M&I Data Services, Inc.	Brown Deer	WI	FRB

Regulated Data Service Providers and Software Vendors

	Name	City	State	Current Agency In Charge
	Office of Thrift Supervision			
1	ARCUS DATA STORAGE, INC.	Union City	CA	OTS
2	Star System, Inc.	San Diego	CA	OTS
3	Connecticut On-Line Computer Center	Avon	CT	OTS
4	Presto Network	Lakeland	FL	OTS
5	Dimension 3000 (The Kirchman Corporation)	Altamonte	FL	OTS
6	Security First Technologies	Atlanta	GA	OTS
7	COMDISCO, INC.	Rosemont	IL	OTS
8	Card Management Corp. (CC)	Evansville	IN	OTS
9	USA Group, Inc.	Indianapolis	IN	OTS
10	First Bank Data Center	Manhattan	KS	OTS
11	Credit Union On-Line	Waltham	MA	OTS
12	G.E.A.C.	St. Louis	MO	OTS
13	NYCE Corporation	Woodcliff Lake	NJ	OTS
14	First Data Corporation, Inc. (FDR)	Hackensack	NJ	OTS
15	Money Station, Inc.	Columbus	OH	OTS
16	NCR Corporation (Formerly AT&T)	Dayton	OH	OTS
17	Midland Mortgage Company	Oklahoma City	OK	OTS
18	Pennsylvania Higher Ed. Assist.Authority	Pittsburgh	PA	OTS
19	Dataone Financial Systems	Pittsburgh	PA	OTS
20	Affiliated Computer Services, Inc. (ACS)	Dallas	TX	OTS
21	Banker II (Bancotec Financial Systems, Inc.)	Irving	TX	OTS
22	DHI Computing Services, Inc.	Provo	UT	OTS
23	TYME Corporation	Brown Deer	WI	OTS